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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 01/05/2023

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January 5, 2023

VIA ECF

Honorable Judge Valerie Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

Re: Falls Lake Nat. Ins. Co. v. Best Interior Solution, Inc. et al
Docket No: 1:22-cv-09354-VEC
Our File No: 22-042

Dear Judge Caproni:

We represent the plaintiff Falls Lake National Insurance Company ("Falls Lake") in this matter, and we write to Your Honor, with consent of all parties that have appeared, to submit a joint letter in accordance with your Honor's November 3, 2022 Order. The case, briefly stated, concerns a denial of insurance coverage based upon several policy provisions in a policy of insurance issued by plaintiff to Best Interior Solution, Inc. as it pertains to property damage alleged at Units 17, 19, and 20 and the common areas located at 301 E. 81st Street, New York, NY 10028 (hereinafter referred to as "Beckford House") claimed to have been caused by work performed by Best Interior. The basis for subject matter jurisdiction is diversity jurisdiction. This is the parties first request for extension of the deadline to submit a joint letter and to extend the time period for the Initial Pretrial Conference scheduled for January 13, 2023, each by thirty (30) days.

By Order dated November 3, 2022, the parties were directed to hold a January 13, 2023 Initial Pretrial Conference and to submit a joint letter by January 5, 2023. The basis for the adjournment and extension sought is that not all parties have appeared or answered and that the parties seek to amend the caption to include only the relevant parties of interest. On the latter

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aspect, plaintiff in in the process of working out a stipulation with the parties to discontinue without prejudice as to Privilege Underwriters Reciprocal Exchange on the basis that its insureds, Moneesha A. Sani 2019 Revocable Trust and Broderick Storie, are the real parties in interest and are named in the lawsuit at issue.

Accordingly, the parties seek to adjourn the relevant deadlines by thirty (30) days so that the January 13, 2023 Initial Pretrial Conference is extended to February 12, 2023 (I will be out of the county in the earlier weeks in February) and that the January 5, 2023 deadline submit a joint letter is extended to February 3, 2023. We ask for this extension so that all of the relevant parties have an opportunity to appear/answer and participate as to the discovery and other proceedings to be scheduled in this matter.

Respectfully submitted,
Miranda Slone Sklarin Verveniotes LLP

s/Steven Verveniotes

Steven Verveniotes

cc: Counsel by ECF.

The Initial Pretrial Conference scheduled for Friday, January 13, 2023 at 10:00 A.M. is hereby adjourned until **Friday, February 10, 2023 at 10:00 A.M.** The deadline for the parties to submit a joint letter and case management plan as set forth in Dkt. 30 is hereby extended from Thursday, January 5, 2023 until **Thursday, February 2, 2023.**

SO ORDERED.

 01/05/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE